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Local Counsel for Plaintiffs

Serena P. Hallowell (*pro hac vice* forthcoming)
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Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

THE BOEING COMPANY EMPLOYEE
RETIREMENT PLANS MASTER TRUST
and THE BOEING COMPANY
EMPLOYEE SAVINGS PLANS MASTER
TRUST,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC.; J. MICHAEL
PEARSON; HOWARD B. SCHILLER;
ROBERT L. ROSIELLO; TANYA CARRO;
and PRICEWATERHOUSECOOPERS,

Defendants.

Civil Case No. _____

PLAINTIFFS' RULE 7.1 STATEMENT

Pursuant to Rule 7.1(a) of the Federal Rules of Civil Procedure, the undersigned counsel for Plaintiffs The Boeing Company Employee Retirement Plans Master Trust and The Boeing Company Employee Savings Plans Master Trust (collectively, “The Boeing Trusts”) hereby certify as follows:

1. Plaintiffs The Boeing Trusts are tax-qualified trusts funding retirement plans sponsored by The Boeing Company and affiliates. The Boeing Company is a publicly held corporation with no parent corporation or publicly held corporation directly owning 10% or more of its stock.

2. To the best of The Boeing Trusts’ knowledge, as of December 31, 2016, State Street Corporation was the beneficial owner of 10.4% of outstanding stock of The Boeing Company, approximately 55.8% of which (or approximately 5.8% of total shares outstanding) is held in The Boeing Company Employee Savings Plans Master Trust, for which State Street Bank and Trust Company acted as trustee.

Dated: September 28, 2017

Respectfully submitted,

LABATON SUCHAROW LLP

KASOWITZ BENSON TORRES LLP

s/Serena P. Hallowell

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